COMMONWEALTH OF MASSACHUSETTS Department of Telecommunications and Energy

RESPONSE OF THE ATTORNEY GENERAL TO THE SECOND SET OF INFORMATION REQUESTS FROM THE BAY STATE GAS COMPANY DTE 05-27

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-10 Please refer to the Cavallo Testimony at 3, line 17. Please provide the organization charter and official purpose of the SSPC.

Response: The Society for Protective Coatings is the only non-profit association that is focused on the protection and preservation of concrete, steel and other industrial and marine structures and surfaces through the use of high-performance industrial coatings. SSPC is the leading source of information on surface preparation, coating selection, coating application, environmental regulations, and health and safety issues that affect the protective coatings industry. Further information can be found at their web site (www.sspc.com).

Mr. Cavallo does not have the "organizational charter" for SSPC.